

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

THE COLEMAN COMPANY, INC.,

Plaintiff/Counterclaim Defendant,

V.

TEAM WORLDWIDE CORPORATION,

Defendant/Counterclaim Plaintiff,

and

CHENG-CHUNG WANG,

Counterclaim Plaintiff.

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Civil Action No. 2:20-cv-351-RGD

JURY TRIAL DEMANDED

**DEFENDANT/COUNTERCLAIM PLAINTIFF TEAM WORLDWIDE
CORPORATION'S MOTION FOR LEAVE
FOR SUPPLEMENTAL EXPERT DISCOVERY**

Pursuant to Federal Rules of Civil Procedure 26(e)(2) and 16(b)(4), Team Worldwide Corporation (“TWW”), by and through its undersigned counsel, respectfully moves for leave for limited supplemental expert discovery to address this Court’s recent claim construction ruling on the disputed term “mattress coil.” *See* ECF No. 232 at 10.

Specifically, TWW requests the following schedule to complete supplemental expert discovery:

- Within seven (7) days of the Court's order, TWW will serve a supplemental expert report on the invalidity of Coleman's '618 Patent.
- Within ten (10) days of TWW serving its supplemental report, Coleman may serve a rebuttal report.
- Within ten (10) days of completing supplemental expert reports, the parties shall complete any expert depositions limited to no more than two hours and limited to the opinions presented in the supplemental reports.

Further support for this Motion is detailed in the Memorandum in Support, filed this same day. A proposed Order granting this relief is attached hereto. The parties have met and conferred, and Coleman has indicated that it opposes the requested relief.

Dated: February 16, 2022

Respectfully submitted,

By: /s/
William R. Poynter (VSB No. 48672)
Alexandra M. Gabriel (VSB No. 89185)
David Sullivan (VSB No. 45027)
KALEO LEGAL
4456 Corporation Lane, Suite 135
Virginia Beach, VA 23462
Phone: 757.238.6383
Fax: 757.304.6175
wpoynter@kaleolegal.com
agabriel@kaleolegal.com
dsullivan@kaleolegal.com

Thomas M. Dunham (pro hac vice)
J. Michael Woods (pro hac vice)
RuyakCherian LLP
1901 L St. NW, Suite 700
Washington, DC 20036
Telephone: (202) 838-1560
tomd@ruyakcherian.com
michaelw@ruyakcherian.com

Korula Cherian (pro hac vice)
Robert Harkins (pro hac vice)
RuyakCherian LLP
1936 University Ave., Ste. 350
Berkeley, CA 94702
Telephone: (510) 944-0190
sunnyc@ruyakcherian.com
bobh@ruyakcherian.com

*Attorneys for Team Worldwide Corporation
and Cheng-Chung Wang*

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing on February 16, 2022 with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all registered users.

By: /s/
William R. Poynter (VSB No. 48672)
KALEO LEGAL
4456 Corporation Lane, Suite 135
Virginia Beach, VA 23462
Phone: 757.238.6383
Fax: 757.304.6175
wpoynter@kaleolegal.com